

622-08/MEU

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
PANAMAX BULK AS,

Plaintiff,

-against-

DAMPSKIBSSELSKABET NORDEN AS,

Defendant.
-----X

08 CIV 8601 (JSR)

**NOTICE OF MOTION FOR
JUDGMENT ON COUNTERCLAIM**

SIRS:

PLEASE TAKE NOTICE that Defendant Dampskibsselskabet Norden AS ("NORDEN"), by its attorneys FREEHILL HOGAN & MAHAR, LLP, upon the accompanying Memorandum of Law, Unger Affirmation, Griffiths Declaration, and the pleadings and proceedings heretofore had herein, will move this Court before the Honorable J.S. Rakoff, United States District Judge, at the Daniel P. Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14-B, New York, New York on the 21st day of May, 2010 at 9:00 a.m. for the following relief:

(a) An Order Granting Judgment on NORDEN's Counterclaim in this action by default;

or, in the alternative,

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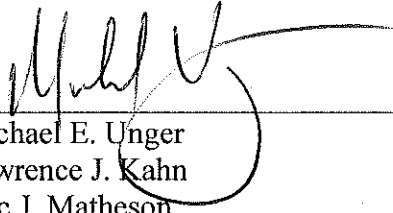
- (b) An Order Granting Summary Judgment on NORDEN's Counterclaim in this action;
or, in the alternative,
- (c) An Order Granting Judgment on NORDEN's Counterclaim based on reconsideration
of the Court's prior directive, and, in addition to (a) or (b) or (c),
- (d) An award of costs, interest and attorneys fees.

PLEASE TAKE FURTHER NOTICE that opposing papers, if any, must be filed and served on or before May 14, 2010, and that reply papers, if any, must be filed and served on or before May 21, 2010.

Dated: New York, New York
April 30, 2010

FREEHILL HOGAN & MAHAR, LLP
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Dampskibsselskabet Norden AS

By:



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